# Remarks/Arguments

The Examiner is thanked for the careful review of this Application. Claims 1-22 are pending after entry of the present Amendment. New claims 21 and 22 have been added. No new subject matter has been introduced.

## Rejections under 35 U.S.C. § 102(e)

Claims 1-19 have been rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,031,577 to Ozkan et al. (hereinafter "Ozkan"). These rejections are traversed as the cited art of record fails to disclose each and every feature of the claimed invention, as defined in independent claims 1, 11, and 15 and the amended independent claim 7 for at least the following reasons.

Ozkan discloses a decoder that decodes video packets of program information containing multiple text strings associated with a program. After video data has been decoded, the decoded video data is transmitted to a display, directly. The Office interprets that the connection between the decoder and the display is interconnect as defined in the claimed invention by assuming "a reasonable but broad interpretation of 'interconnect.'" The Applicants respectfully disagree with such broad interpretation.

In the claimed invention, <u>decoded data is transmitted to an interconnect</u> which in turn <u>is coupled to an output device</u> in a multimedia system (as defined in independent claim 1). The interconnect is one of many features of the claimed invention and is a not a connection. Rather, the interconnect is coupled to the bulk decoder and the display using respective connections. In Ozkan, the display is coupled to the decoder itself, directly, via a connection. Furthermore, the decoded data is transmitted from the decoder to the display, directly, via the same connection (i.e., decoded data is not transmitted from the connection to an intermediate component such as interconnect and thereafter from the interconnect to the display). In sum, Ozkan does not disclose an interconnect or a display that is coupled to the interconnect (as defined in independent claim 1) or distributing decoded signals to corresponding output devices through an interconnect (as defined in claim 11).

Additionally, in the bulk decoder of the claimed invention, as defined in claim 11, the demultiplexer and multiplexer are both coupled to the central processor. In Ozkan, however, the alleged central processor 60 is connected to what the Office interprets to be the network, and as such, is neither coupled to the demultiplexer nor the multiplexer.

Furthermore, independent claim 15 of the claimed invention provides a method for sharing decoding resources in a network. Decoding resources can be shared because the bulk decoder of the claimed invention is not a part of the network. Nor is the bulk decoder a part of the desktop unit that includes the display. In Ozkan, however, the alleged bulk decoder is shown to be a part of the computer system including the display, as the decoder is directly connected to the display through a connection.

Still further, the bulk decoder defined in the amended independent claim 7 includes a processor. As defined, the processor is capable of converting a signal received from the network that includes intermixed data into a single protocol signal. However, the components cited by the Office interpreting to be the processor fail to perform the functions of the processor. The alleged processor 60, the data transport and decoder and multiplexer 22, or the sub-picture processor 30 cited by the Office are incapable of converting a signal that includes intermixed data into a single protocol signal. It must be noted that the Office has already cited to the controller/processor 60 as the central processor. As such, the controller/processor 60 cannot be the central processor and the processor that is defined in the bulk decoder. Same applies to the data transport decoder and demultiplexer 22, as the Office has referred to the data transport decoder and demultiplexer 22 as the demultiplexer. The sub-picture processor is disclosed to decode and decompress subpicture data that includes text messages. In doing so, however, Ozkan fails to disclose that the sub-picture processor is capable of converting a signal that includes intermixed data to a single protocol signal. Thus, Ozkan fails to disclose each and every feature of the claimed invention, as defined in independent claims.

Thus, Applicants respectfully submit that independent claims 1, 7, 11, and 15 are patentable under 35 U.S.C. § 102(e) over Ozkan. Similarly, dependent claims 2-6, 8-10, 12-14,

and 16-19 each of which directly or indirectly depend from respective independent claim are taught to be patentable for at least the same reasons discussed above.

## Rejections under 35 U.S.C. § 103(a)

The Office has rejected claim 20 under 35 U.S.C. 103(a), as being unpatentable over Ozkan in view of the paper entitled "Real-Time Parallel MPEG-2 Decoding in Software" to Bilas et al. (Bilas). The Applicants respectfully traverse this rejection as the cited references, individually or collectively, would not have taught or suggested the claimed invention, as defined in independent claim 15, to one of ordinary skill in the art.
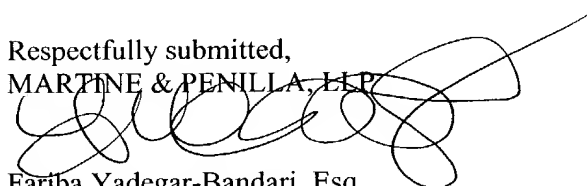
Bilas's article teaches a parallel decoder for the MPEG coding standard that is implemented on a shared memory multiprocessor. The processors in Bilas are capable of handling only a single format data (i.e., MPEG standard) and are defined in a single multiprocessor (i.e., a single computer). As a result, in Bilas, the processors cannot be shared between different multiprocessors. Nor does Bilas teach or suggest using processors that can be shared or that are capable of handling more than a single data format. Furthermore, the processors in Bilas have not been taught or suggested to be able to decode a signal including intermixed data into a single protocol signal. Additionally, Bilas does not teach or suggest using an interconnect and transmitting the decoded data to the interconnect.

Summarily, Bilas fails to cure any of the deficiencies which have already been pointed out in Ozkan. Thus, one of ordinary skill in the art modifying Ozkan using the teachings of Bilas would not have arrived at the claimed invention, as defined in independent claim 15. Thus, independent claim 15 is patentable over any combination of the cited prior art. Accordingly, the Applicants respectfully request that rejection of claim 19 under U.S.C. 103(a) over the cited prior art be withdrawn.

New independent claim 21 recites the subject matter of independent claim 11 and claim 12, and new independent claim 22 includes the subject matter of claims 15 and 16. As described in more detail above, all cited references fail to disclose, teach, or suggest the claimed invention as defined in new independent claims 21 and 22.

In view of the foregoing, the Applicants respectfully submit that all of the pending claims 1-20 are in a condition for allowance. Accordingly, a Notice of Allowance is respectfully requested. If the Examiner has any questions concerning the present Amendment, the Examiner is kindly requested to contact the undersigned at (408) 749-6900, ext. 6913. If any additional fees are due in connection with filing this Amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No. SUNMP580). A duplicate copy of the transmittal is enclosed for this purpose.

Respectfully submitted,
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